

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE a/k/a
LATASHA TRANSRINA HOWARD and
STARMARIE EBONY JONES,

Defendants.

Case No. 1-19-cv-01301-WMR

JOINT MOTION FOR EXTENSION OF DISCOVERY DEADLINES

Plaintiff Belcalis Marlenis Almánzar (“Plaintiff”) and Defendant Latasha Transrina Kebe (“Kebe”) respectfully submit this Joint Motion for Extension of Discovery Deadlines in this matter, and provide as follows:

1. On August 26, 2019, the parties filed their Joint Preliminary Report and Discovery Plan (the “Discovery Plan”) in this action. (ECF No. 17.) Although the Court has not entered the Discovery Plan as an order, the parties have been operating pursuant to the Discovery Plan’s directives and deadlines.
2. Plaintiff propounded written demands on October 4, 2019, and Kebe served written responses in November of 2019 and certain responsive

documents in December of 2019. Kebe propounded written demands on February 9, 2020.

3. The recent pandemic has disrupted the lives and day-to-day operations of the parties and their attorneys, each of whom are located in States and/or Counties that have been seriously affected by the pandemic, including by quarantine directives and shelter in place mandates. The extensions requested below are intended to enable the parties to complete their discovery obligations in light of these significant disruptions.
4. As a result, the parties have agreed to extend Plaintiff's time to respond to Kebe's written discovery requests up to, and including, June 8, 2020. The parties are still working through issues related to document discovery and have held off finalizing the timing and location of depositions until those issues are resolved. In addition, the third-party discovery that the parties anticipated pursuing will be delayed and more difficult in light of the COVID-19 pandemic.
5. The current deadline under the Discovery Plan to complete discovery and file motions to compel is April 27, 2020. In light of the foregoing, the parties request that the deadline for all parties to

complete discovery and file discovery motions, including but not limited to motions to compel, be extended to August 27, 2020.

6. The current deadline to file motions for summary judgment is May 26, 2020. The parties request that the deadline for the parties to file motions for summary judgment be extended to September 28, 2020.

Dated: April 8, 2020

Respectfully submitted,

/s/Sarah M. Matz

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CERTIFICATION AS TO FONT

In accordance with Local Rule 7.1(D), the undersigned certifies that the foregoing document was prepared with Times New Roman 14, a font and point selection approved by the Court in Local Rule 5.1(C).

DATED: April 9, 2020

/s/Sarah M. Matz
Sarah M. Matz (admitted *pro hac vice*)

CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2020, I electronically filed the foregoing JOINT MOTION FOR EXTENSION OF DISCOVERY DEADLINES with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all of the attorneys of record.

/s/Sarah M. Matz
Sarah M. Matz (admitted *pro hac vice*)